

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

WEARABLE SHOE TREE LLC,

Plaintiff,

v.

Civil Action No. 4:24-cv-334-SDJ

THE INDIVIDUALS, BUSINESS ENTITIES, AND  
UNINCORPORATED ASSOCIATIONS IDENTIFIED ON  
EXHIBIT 1,

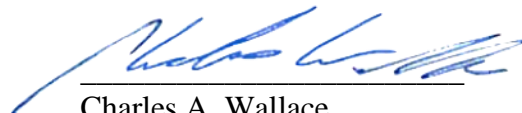
Defendants.

**DECLARATION OF CHARLES A. WALLACE IN SUPPORT OF  
PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

I, Charles A. Wallace, pursuant to Fed. R. Civ. P. 65(b)(1), declare as follows:

1. "I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in this Declaration is based on my personal knowledge.
2. I am an attorney at the law firm Scale LLP, located at 5473 Blair Road, Suite 100, Dallas, Texas 75231, and I am licensed to practice in the State of Texas.
3. Plaintiff Wearable Shoe Tree LLC ("Plaintiff") retained Scale LLP to represent it in the above-styled lawsuit. As counsel of record for Plaintiff, I have personal knowledge of this lawsuit, the filings in this proceeding, and the facts related thereto.
4. I make this declaration in support of Plaintiff's Motion for Default Judgment, which plaintiff filed with the Court on August 7, 2024. Dkt. 59.
5. On January 21, 2025, the Court ordered Plaintiff to refile an updated table of current defendants that includes "the intellectual-property-infringement information Wearable Shoe Tree has provided in the past" such as information to "link what proof of infringement goes with which Defendant." Dkt. 87. Plaintiff thus provides the Court with the attached as Exhibit 1, which represents a true and correct accounting of the defendants that have yet to be dismissed from this case, as well as the Plaintiff IP that each defendant is alleged to have infringed, and is meant to replace Exhibit 1 to Plaintiff's Motion for Default Judgment (Dkt. 59-2)."

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 24, 2025.



Charles A. Wallace  
Scale LLP